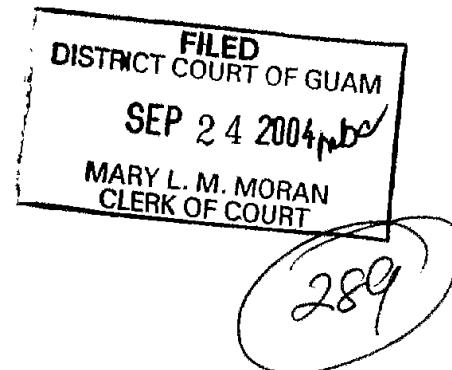


**JACQUES G. BRONZE, ESQ.**  
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**RICHARD A. PIPES, ESQ.**  
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Telephone: (671) 646-2001



*Attorneys for Defendant Hongkong and Shanghai Banking Corporation, Ltd.*

DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU	)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S	)	
INC., a Guam corporation,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	DECLARATION OF JACQUES G.
	)	BRONZE IN SUPPORT OF EX
HONGKONG AND SHANGHAI	)	PARTIE APPLICATION AND
BANKING CORPORATION, LTD.,	)	CONSENT OF LOCAL COUNSEL
et al.,	)	TO ACT AS CO-COUNSEL
	)	
Defendants.	)	
	)	

I, the undersigned hereby state and depose as follows:

1. That I am an active member and in good standing of the bar of the above entitled court. My Bar No. is 96003.

**ORIGINAL**

2. That I hereby consent to act as local counsel and co-counsel for Peter S. Modlin of the Law Firm of Farella Braun & Martel LLP, in connection with the above-referenced action. The basis for filing this Motion for *Ex Parte* is the fact that Mr. Modlin will be involved in a motion to reconsider which will be filed on Wednesday, September 29, 2004.

3. I agree to act as local counsel so that service of papers may be made upon my office and the Law Firm of Farella Braun & Martel LLP. My address and phone numbers is contained on the first page of this document.

4. On September 22, 2004, I faxed a letter to Anita P. Arriola, attorney for Plaintiffs, regarding this *Ex Parte* Application for Admission *Pro Hac Vice*. A true and correct copy of the letter is attached hereto as Exhibit "1." Attorney Arriola did respond to my letter and had no objections subject to the limitation placed in her letter. A true and correct copy of the letter is attached hereto as Exhibit "2." HSBC does not waive any arguments raised in its appeal to a federal judge relating to the modification of the scheduling order. Mr. Modlin was never an issue in that appeal.

5. I understand the obligations assigned to me as local counsel pursuant to the Rules of Court.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

**EXECUTED** on this 24<sup>th</sup> day of September 2004.



JACQUES G. BRONZE

LAW OFFICES  
**BRONZE & TANG**  
A PROFESSIONAL CORPORATION  
BANKPACIFIC BUILDING, 2ND FLOOR  
825 SOUTH MARINE CORP DRIVE  
TAMUNING, GUAM 96913

JACQUES G. BRONZE  
JERRY J. TANG

TELEPHONE: (671) 646-2001  
TELECOPIER: (671) 647-7671

September 22, 2004

**VIA: FACSIMILE**  
**(671) 477-9734**

**CONFIRMED**

Anita P. Arriola, Esq.  
**ARRIOLA, COWAN & ARRIOLA**  
Suite 201, C&A Professional Bldg.  
259 Martyr Street  
Hagåtña, Guam 96910

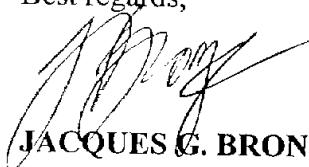
Re: Sadhwani, et al. v. HSBC, et al.; Civil Case No. 03-00036

Dear Anita:

On Friday, September 24, 2004, HSBC will be filing an *Ex Parte* Application for Admission *Pro Hac Vice* of Peter S. Modlin from the firm of Farella Braun & Martel LLP, located in San Francisco, California. Pursuant to Local Rule 7.1(j), please be advised that we will be submitting an *ex parte* application and declaration in support of the proposed order granting the application. We do not know when the *ex parte* application will be heard by the Court but we will advise your office as soon as we know. Please advise if you have any objection to my *Ex Parte* Application. If you do not, I will assume that you do not wish to be present at a hearing on this matter. If this assumption is incorrect, please contact me by 12:00 noon, Friday, September 24, 2004.

Please feel free to contact me if you have any questions regarding the above matter.

Best regards,



JACQUES G. BRONZE

cc: \*Mr. C. Underwood

JGB:tc

D:\CLIENTS\FILE\HSBC-Sadhwani\Ltrs\A Arriola-Ltr.71(ExParte-ProHac Vice).doc

EXHIBIT 1

LAW OFFICES  
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825 SOUTH MARINE CORP DRIVE  
TAMUNING, GUAM 96913

TELEPHONE NO.: (671) 646-2001

FACSIMILE NO.: (671) 647-7671

~ ~ **FACSIMILE TRANSMITTAL SHEET** ~ ~

*Date:* September 22, 2004

*To:* Anita P. Arriola, Esq.

*Firm:* **ARRIOLA, COWAN & ARRIOLA**

*Fax No:* 477-9734

*From:* Jacques G. Bronze, Esq.

*Subject:* Sadhwani, et al. v. HSBC, et al.; Civil Case No. 03-00036

Sending 2 page(s) including cover sheet.

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**MESSAGE:**

**PLEASE SEE ATTACHED DOCUMENT(S) IN CONNECTION WITH THE ABOVE-REFERENCED MATTER:**

Letter of even date.

**Fax Sent By:** tony camacho

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE AND THE DOCUMENTS WHICH ACCOMPANY IT ARE CONFIDENTIAL COMMUNICATIONS SUBJECT TO THE ATTORNEY-CLIENT WORK PRODUCT PRIVILEGES. They are intended exclusively for the use of the addressee named above. If you are not the intended recipient, or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication or the accompanying document is strictly prohibited. If you have received this communication in error, please immediately notify the Law Offices of Bronze & Tang, P.C. by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

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**BRONZE & TANG**  
A PROFESSIONAL CORPORATION  
BANKERS BUILDING, 2ND FLOOR  
6218 SOUTH KAREN KOURI DRIVE  
TANJUNGS, GUAM 96913

TELEPHONE 671 644-2001 FAXPHONE NO.: (671) 647-7671

## ~ ~ FACSIMILE TRANSMITTAL SHEET ~ ~

*Date:* September 22, 2004  
*To:* Anita P. Ariola, Esq.  
*Firm:* **ARRIOLA, COWAN & ARRIOLA**  
*Fax No:* 477-9734  
*From:* Jacques G. Bronze, Esq.  
*Subject:* Sadhwani, et al. v. HSEC, et al.; Civil Case No. 03-00036  
 Sending 2 page(s) including cover sheet.

Original will not follow       Original will follow by  
Regular Mail: \_\_\_\_\_ Other: \_\_\_\_\_

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 RIM: Receive to Memory  
 LPR: Local Print

PD: Polling by Remote  
 PG: Polling a Remote  
 DR: Document Removed  
 FOT: Formed Output

MB: Receive to Mailbox  
 PI: Power Interruption  
 TM: Terminated by user  
 WT: Waiting Transfer

Law Offices

***Arriola, Cowan & Arriola***

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Mark E. Cowan  
Anita P. Arriola  
Joaquin C. Arriola, Jr.  
  
Jacqueline T. Terlaje

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September 23, 2004

**VIA FACSIMILE: (671) 647-7671**

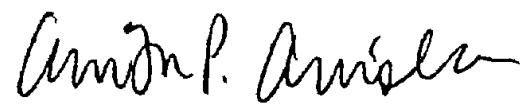
Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
2nd Floor, Bank Pacific Building  
825 S. Marine Drive  
Tumuning, Guam 96913

Re: Sadhwani et al. v. Hongkong Shanghai Banking Corporation, Ltd., et.al,  
District Court of Guam, Civil Case No. CV03-00036

Dear Jacques:

This is to inform you that I do not oppose the Ex Parte Application for Admission *Pro Hac Vice* of Peter S. Modlin unless his late appearance in the case will be used by HSBC to attempt to modify, extend or continue the trial date or any other deadlines contained in the Stipulation and Order Extending Scheduling Order. Accordingly, please inform the Court in your Certificate of Counsel of those grounds for my opposition. I wish to be present at any hearing on the ex parte application.

Very truly yours,

  
ANITA P. ARRIOLA

**EXHIBIT** 2